



September 27, 2019

CERTIFIED MAIL: 7018 0680 0000 1036 1823  
RETURN RECEIPT REQUESTED

Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
Box 7611 Ben Franklin Station  
Washington, D.C. 20044-7611  
Re: DOJ No. 90-5-2-1-10459

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RETURN RECEIPT REQUESTED

Director, Air Enforcement Division  
Office of Civil Enforcement  
U.S. EPA Headquarters, MC 2242A  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

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RETURN RECEIPT REQUESTED

Chief, Air and TRI Section  
Enforcement Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**RE: Consent Decree No. CV-15-02206-PHX-DLR – Notification of Operating Limit Exceedance**

To whom it may concern:

ASARCO LLC (Asarco) is submitting this notification per Consent Decree No. CV-15-02206-PHX-DLR Paragraph 57 of an emission limit exceedance. Between September 26, 2019 at 17:00 and September 27, 2019 at 10:00 the rolling eight (8) hour emission limit of 23 mg/dscm was exceeded at the Flash Furnace Vent Gas Baghouse as specified in Paragraph 19.a. After performing maintenance in the Flash Furnace Vent Baghouse, a maintenance crew shut a door to one of the modules which induced a draft. This draft picked up particles of rust from the baghouse floor and walls and

introduced the particles to the air stream. The door was closed at approximately 12:45pm on 9/26/19 but the emission limit was not exceeded until 17:00 on 9/26/19 with a value of 25.23 mg/dscm. The emission limit was exceeded for each subsequent hour until 9:00am on 9/27/19 when the door was opened to the module. After opening the door, the instantaneous readings fell below the emission limit, however the eight-hour rolling average did not go below the limit until 9:00am on 9/27/19. Maintenance crews have been instructed not to close doors between modules as that action can introduce excess particles into the airstream.

If there are any questions, please contact Jeff Anderson at (520) 356-3208.



Steve Gasser  
Smelter Manager  
Hayden Operations

SG/rcg

pc: R. Rubio  
A. Veek